

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO**

ELIZABETH SINES et al.

Plaintiffs

:

Case No. 3:17-cv-72

:

Judge MOON

Mag. Judge HOPPE

:

-v-

JASON KESSLER et al.

:

:

Defendants

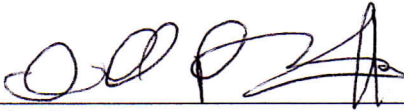
DECLARATION OF MATT PARROTT

Mr. Matt Parrott, having been duly cautioned, declares and states as follows:

1. This declaration is based on personal knowledge.
2. I have, and have had for many years, physical control over the electronically stored information of the Traditionalist Workers Party ("TWP"). This control is authorized by the TWP.
3. Despite the recent public controversy concerning myself and one other member of the TWP, my control over these records continues to be authorized by the TWP.
4. It is true that I have disabled the TWP internet presence for the time being.
5. It is not true that I have deleted or otherwise concealed, nor tried to delete or otherwise conceal, any electronically stored records of the TWP, including records explicitly mentioned in the Plaintiff's motion for sanctions at DE 272.

6. I am aware of my, and TWP's, legal obligations as to discoverable information and the potentially severe sanctions for violation of same.
7. I have not taken any actions contrary to, or in violation of, these legal obligations.
8. The electronic records identified in Plaintiffs discovery requests and motion at DE 272 do exist and have existed. There is no need to attempt to repopulate or recover any such records as none have been deleted or otherwise tampered with.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 14, 2018.



Matt Parrott